

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) CR. NO. 2:06CR155-MHT
)
QUINTRELL MARTIN)

UNITED STATES RESPONSE TO DEFENDANT'S MOTION
FOR REDUCTION OF SENTENCE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and responds to Defendant Martin's Motion for Reduction of Sentence:

1. On June 14, 2007, Defendant Quintrell Martin was sentenced by this Honorable Court to the custody of the Bureau of Prisons to be imprisoned for a term of 120 months. Martin was convicted of one count of being a felon in possession of a firearm. According to the Pre-Sentence Report, Martin's possession of a firearm was related to the death of Mr. Johnny Jackson.

2. Pursuant to a written plea agreement, Martin agreed to cooperate with the United States and the State of Alabama. According to the plea agreement, the extent of any downward departure for substantial assistance would be at the sole discretion of the United States. Since June 14, 2007, Martin has cooperated with the State of Alabama and testified on a number of occasions.

3. According to Scott Green, Deputy District Attorney for the Fifteenth Judicial Circuit, Martin has been instrumental in the successful prosecution of multiple murder cases investigated by the State of Alabama. Specifically, Martin testified twice in the case of State v. Anthony Cowart and he testified in the case of State v. Michael Gray. Both prosecutions resulted in convictions and substantial sentences for the defendants. In addition to testifying in these cases, Martin's information was useful in negotiating plea agreements with other defendants.

4. Pursuant to the plea agreement, the United States has now moved to reduce Martin's sentence by 18 months. An 18 month downward departure represents a reduction of 6 months for each trial Martin participated in on behalf of the State of Alabama. In addition, an 18 month reduction seeks to balance Martin's significant criminal history with the assistance he provided to the State of Alabama.

5. Finally, pursuant to the plea agreement, the United States agreed not to prosecute Martin for the circumstances surrounding Mr. Johnny Jackson's death. Considering the value of that agreement, and now an 18 month reduction for assistance to the State of Alabama, Mr. Martin's bargain with the United States is satisfied. The United States has been consistent with Mr. Martin throughout these proceedings that an 18 month reduction for his assistance is appropriate.

Wherefore, premises considered, the United States asserts that an 18 month reduction is appropriate in this case.

Respectfully submitted this the 9th day of November, 2007.

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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Richard Keith.

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